

# **EXHIBIT K**



2. I make this declaration in support of Defendants’<sup>1</sup> Motion for Extension of Schedule.

3. PPFA retained O’Melveny & Myers as counsel in this case in or around the last week of May 2022.

4. On or around May 27, 2022, the Relator and the State of Texas (“Texas”) served Requests for Production and Interrogatories on PPFA. PPFA’s written responses to those requests and interrogatories are due on June 27, 2022. The Relator and Texas subsequently served additional discovery requests to which PPFA’s written responses are due in mid-July 2022.

5. As soon as O’Melveny & Myers was retained, we worked diligently to ensure that PPFA’s change in counsel would not unduly delay PPFA’s initial service of discovery requests or PPFA’s written response to any discovery requests served by Plaintiffs.

6. On or around June 3, 2022, PPFA served its Requests for Production and Interrogatories on the Relator and Texas.

7. PPFA and its counsel are working diligently to identify relevant custodians and collect documents responsive to the Relator’s and Texas’s requests for production. PPFA will respond in writing to those requests within the 30-day response period provided by Federal Rule of Civil Procedure 34.

8. It is not feasible for PPFA to also identify relevant custodians and collect, process, review, log, and produce all documents responsive to Plaintiffs’ requests within a 30-day period. While PPFA is diligently and in good faith collecting, processing, reviewing, and logging responsive documents, PPFA will need to produce responsive materials on a rolling basis.

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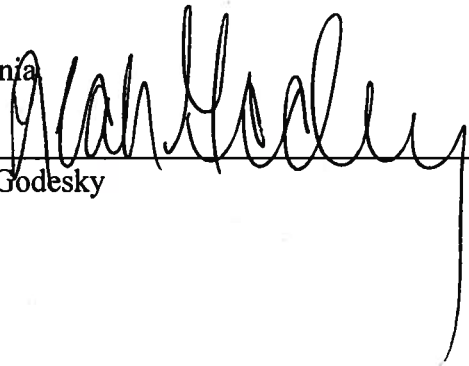
<sup>1</sup> This declaration refers to Defendants Planned Parenthood Gulf Coast, Inc. (“PPGC”), Planned Parenthood of Greater Texas, Inc. (“PPGT”), Planned Parenthood South Texas, Inc. (“PPST”), Planned Parenthood Cameron County, Inc. (“PP Cameron County”), and Planned Parenthood San Antonio, Inc. (“PP San Antonio”), together with PPFA, as “Defendants.”

Pursuant to Federal Rule of Civil Procedure 34(b)(2)(A), PPFA will substantially complete those productions within a reasonable time after its service of written responses to each set of discovery requests. PPFA is committed to all good-faith efforts to ensure production in response to Texas's and the Relator's first requests for production by August 1, 2022.

9. I am scheduled to try a February 20, 2023, jury trial in *Gottwald v. Sebert*, Case No. 653118/2014 (N.Y. Sup. Ct.). The case has been pending for nearly eight years and the trial date was long-ago scheduled. Trial is expected to last through the end of March 2023.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Executed on June 27, 2022 in Los Angeles, California

  
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Leah Godesky